

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO: WAVE 4 CASES ON ATTACHED EXHIBIT A</b>	

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS  
AND TESTIMONY OF STANLEY ZASLAU, MD**

Plaintiffs respectfully request that the Court preclude defense expert Stanley Zaslau, M.D., from giving opinions on: (1) the adequacy of Defendants' product warnings and IFUs, including opinions regarding what risks of the devices other doctors know of; (2) whether Defendants' transvaginal mesh products are defectively or reasonably designed; (3) particle loss and fraying of mechanically cut mesh; (4) roping or curling of mechanically cut mesh; (5) the degradation of polypropylene or its clinical significance; (6) whether the products at issue are associated with chronic or long term pain; and (7) any opinion regarding safety, efficacy, or personal satisfaction rates of the mesh products observed in his own practice. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: April 13, 2017

Respectfully submitted,

/s/Thomas P. Cartmell

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on April 13, 2017 using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Thomas P. Cartmell

**Attorney for Plaintiffs**